

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA, *ex rel.*
KUSHWINDER SINGH,

Plaintiff,

v.

ALEDADE, INC., et. al.,

Defendants.

No. 2:21-cv-00410-KKE

STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
TIME TO RESPOND TO SECOND
AMENDED COMPLAINT AND INITIAL
CASE DEADLINES

NOTE ON MOTION CALENDAR:
September 5, 2024

Plaintiff Kushwinder Singh (“Plaintiff”) and Defendant Aledade, Inc. (“Defendant”) (collectively, “the Parties”), by and through their counsel of record, respectfully submit this Stipulation, and respectfully request that the Court enter the proposed order extending the time for Defendant to respond to the Second Amended Complaint (“SAC”).

1. On August 1, 2024, pursuant to Fed. R. Civ. P. 15(a)(2) and LCR 15(b), and as stipulated by the Parties, Plaintiff filed the SAC. In the SAC, Plaintiff amended his retaliation causes of action against Aledade, Inc, and removed all Federal False Claims Act (“FCA”) causes of action asserted in the First Amended Complaint against all defendants, including Aledade.

2. On August 2, 2024, the Court set Initial Scheduling Dates. (Dkt. No. 44) (“the Order Setting Initial Scheduling Dates”).

STIPULATED MOTION AND ORDER
TO EXTEND TIME TO RESPOND- 1
(No. 2:21-cv-00410-KKE)

CORR CRONIN LLP
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Tel (206) 625-8600
Fax (206) 625-0900

1 3. On August 13, 2024, the Court granted the Parties' Stipulated Motion of Voluntary
2 Dismissal and all FCA causes of action were dismissed. (Dkt. No. 46).

3 4. Defendant's deadline to respond to Plaintiff's SAC is September 6, 2024. (Dkt.
4 No. 41).

5 5. On August 23, 2024, pursuant to the Order Setting Initial Scheduling Dates, the
6 Parties met and conferred.

7 6. The Parties are currently discussing the potential for resolution of this matter.

8 7. An extension would further judicial economy, and no party will be prejudiced by
9 an extension.

10 8. Based on the foregoing and to facilitate these discussions, the Parties jointly request
11 that the Court extend the deadline for Defendant to answer or otherwise respond to the SAC for
12 one month until October 4, 2024.

13 9. The Parties also jointly request an extension of the Initial Scheduling Dates as
14 follows:

15 i. Initial Disclosures Pursuant to FRCP 26(a)(1) due October 4, 2024

16 ii. Combined Joint Status Report and Discovery Plan due October 11, 2024

17 10. The Parties intend to also submit this joint request for extension via email to the
18 Courtroom Deputy as required under the Order Setting Scheduling Dates.

19 11. A proposed order is subjoined herewith.

20
21
22 //

23 //

24 //

25 //

DATED this 5th day of September, 2024. I certify that this document contains 322 words,
in compliance with the Local Civil Rules.

TELLER LAW

s/ Stephen Teller

Stephen Teller, WSBA No. 23372
300 Lenora Street, Suite 1471
Seattle, WA 98121
Ph: (206) 324-8969
steve@stellerlaw.com

Seth Rosenberg, WSBA No. 47474
Joseph D. Gehrke, WSBA No. 41660
THE SEATTLE LITIGATION
GROUP, PLLC
1215 4th Avenue, Suite 1100
Seattle, WA 98161
Ph: (206) 407-3300
seth@seattlelitigation.com
joe@seattlelitigation.com

Attorneys for Plaintiff Kushwinder Singh

CORR CRONIN LLP

s/ Jeffrey B. Coopersmith

Jeffrey B. Coopersmith, WSBA No. 30954
1015 Second Avenue, Floor 10
Seattle, Washington 98104-1001
Ph: (206) 625-8600
jcoopersmith@corrchronin.com

Brian P. Dunphy (*Pro Hac Vice*)
Nicole E. Henry (*Pro Hac Vice*)
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, P.C.
One Financial Center
Boston, MA 02111
Ph: (617) 542-6000
BDunphy@mintz.com
NEHenry@mintz.com

Karen S. Lovitch (*Pro Hac Vice*)
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY
AND POPEO, P.C.
555 12th Street NW
Suite 1100
Washington, DC 20004
Ph: (202) 434-7300
kslovitch@mintz.com

Attorneys for Defendant Aledade, Inc.

ORDER

IT IS SO ORDERED.

DATED this ____ day of _____, 2024.

Judge Kymberly K. Evanson
United States District Judge